

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANTHONY RAPP and C.D.,

Plaintiffs,

-against-

KEVIN SPACEY FOWLER a/k/a KEVIN SPACEY

Defendant.
-----X

Case No. 1.20-cv-09586 (LAK)

**DECLARATION OF PETER J.
SAGHIR IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION *IN*
LIMINE NO. 4 TO PRECLUDE
PLAINTIFF FROM
PRESENTING CERTAIN
TESTIMONY**

Pursuant to 28 U.S.C. § 1746, I, Peter J. Saghir, declare under penalty of perjury as follows:

1. I am a member of the Bar of the State of New York and a bar of this Court. I am also a member of Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman & Mackauf, attorneys for plaintiff Anthony Rapp. This declaration is in support of the opposition of plaintiff, Anthony Rapp, to defendant's Motion *In Limine* No. 4 that seeks to preclude Plaintiff from presenting evidence about or referencing Dawes and Holtzman or any other alleged incident, and for such other relief as the Court deems just and proper.

2. Attached as **Exhibit A** to this declaration is a true and correct copy of selected pages from the Reporter's Transcript of the Deposition of Anthony Rapp taken in this action on February 3, 2021.

3. Attached as **Exhibit B** to this declaration is a true and correct copy of selected pages from the Reporter's Transcript of the Deposition of Andrew Holtzman taken in this action on January 7, 2022.

4. Attached as **Exhibit C** to this declaration is a true and correct copy of selected pages the Reporter's Transcript of the Deposition of Justin Dawes taken in this action on December 28, 2021.

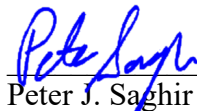
5. Attached as **Exhibit D** to this declaration is a true and correct copy of the March 7, 2022 email from Plaintiff's counsel to the Court.

6. Attached as **Exhibit E** to this declaration is a true and correct copy of selected pages from the Reporter's Transcript of the Deposition of Alexander Bardey, M.D., taken in this action on January 26, 2022.

7. Attached as **Exhibit F** to this declaration is a true and correct copy of selected pages from the Reporter's Transcript of the Deposition of Defendant Kevin Spacey Fowler taken in this action on January 17, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 3, 2022



Peter J. Saghir (4276)
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